

BEFORE THE PUBLIC UTILITIES COMMISSION OF  
THE STATE OF CALIFORNIA



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Order Instituting Rulemaking on the  
Commission's Own Motion into the  
Service Quality Standards for All  
Telecommunications Carriers and  
Revisions to General Order 133-B.

Rulemaking 02-12-004  
(Filed December 5, 2002)

**REPLY COMMENTS OF DISABILITY RIGHTS ADVOCATES ON ASSIGNED  
COMMISSIONER'S RULING AND SCOPING MEMO**

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## I. INTRODUCTION

It is evident from reviewing the opening comments that most carriers support little to no monitoring of service quality by the Commission. However, the Commission has an obligation to monitor service quality, as set out in Pub. Util. Code §§ 709 and 2896.<sup>1</sup> If the Commission were to take the hands-off approach advocated by the carriers, it would be in violation of its obligation. While Disability Rights Advocates (DisabRA) agrees that current service quality metrics should be reevaluated, particularly in light of newer technologies, the Commission must not forget its duty to ensure the provision of quality telecommunications to *all* Californians. Aside from the suggestions offered by The Utility Reform Network (TURN) and the Division of Ratepayer Advocates (DRA), DisabRA sees virtually no affirmative suggestions submitted in these comments as to how the Commission can effectively monitor service quality, particularly in the new post-URF environment. The only option presented by the carriers is to commission of a consumer survey or to expect consumers to rely on customer satisfaction information collected by independent third-parties in the course of their business activities. As stated in our opening comments, DisabRA believes that reliance on customer surveys alone is insufficient to provide the Commission with a comprehensive picture of the state of telecommunications services offered by the carriers and is insufficient to provide consumers with the information they need to make educated, informed choices about which services are best suited to their needs. Therefore, DisabRA requests that the Commission adopt one of the proposals set forth by TURN or DRA,

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<sup>1</sup> These obligations are to “continue [its] universal service commitment by assuring the continued affordability and widespread availability of high-quality telecommunications services to *all* Californians” (§ 709(a) (emphasis added)) and to “require telephone corporations to provide customer service to . . . consumers that includes but is not limited to . . . sufficient information upon which to make informed choices . . . including, but not limited to information regarding . . . service options, pricing, and terms and conditions of services” (§2896(a)). Additionally, the Commission must assure that carriers provide “reasonable statewide service quality standards, including but not limited to, standards regarding network technical quality, customer service, installation, repair and billing.” (§2896(c).)

as those provide mechanisms for ensuring comprehensive and effective monitoring of service quality.

## **II. COMPETITION ALONE IS NOT SUFFICIENT TO ENSURE ADEQUATE SERVICE QUALITY**

The Commission stated that “service quality regulation should aim to . . . rely on competition wherever possible.”<sup>2</sup> In the URF proceeding, DisabRA presented significant, uncontested evidence showing that the market does not compete for customers with disabilities.<sup>3</sup> Neither the Commission nor any carrier has directly addressed this issue. Considering the dearth of competitive telecommunications services for people with disabilities, the Commission cannot rely on a non-existent competitive market to ensure quality services for some of California’s most vulnerable consumers. DisabRA reiterates its position that the Commission should require carriers to collect information regarding services specific to the needs of people with disabilities and provide consumers with unfettered access to that information.

## **III. THE COMMISSION’S OBLIGATION TO MONITOR SERVICE QUALITY CANNOT BE SATISFIED BY THE INDEPENDENT ACTIONS OF A THIRD PARTY**

As stated in our Opening Comments, DisabRA does not believe that customer satisfaction surveys are sufficient on their own to meet the Commission’s obligation to monitor the provision of services by telecommunications providers.<sup>4</sup> However, such surveys, if appropriately designed, could prove insightful and informative. Most service providers, however, advocate that the Commission not conduct, or commission a third party to conduct, customer satisfaction surveys, and instead support reliance on entities that are allegedly already compiling relevant information.<sup>5</sup> DisabRA supports the commission of a third-party independent survey, as discussed in the URF workshops, and would be willing to work with any party conducting the survey to ensure that the needs of people with disabilities are appropriately

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<sup>2</sup> ACR, p. 3.

<sup>3</sup> See DisabRA Comments in R.05-04-005, submitted on May 31, 2005, at p. 6

<sup>4</sup> DisabRA Opening Comments, pp. 4-6.

<sup>5</sup>

addressed.<sup>6</sup> However, DisabRA adamantly opposes reliance on existing customer satisfaction information collected by third parties through the course of their independent business activities.

CTIA – The Wireless Association advocates in its opening comments that the Commission rely on customer satisfaction information collected by such organizations as J.D. Power and Associates, *Consumer Reports*, *PC Magazine's Readers' Choice*, *Consumers' CHECKBOOK*, mindWireless and Mountain Wireless. None of these organizations is under any statutory obligation to monitor the quality of services to telecommunications customers, let alone specifically California telecommunications customers. These entities select a limited set of information to collect– and the quality and extent of information collected varies widely – through the course of their business activities. The information they collect does not have to include any specific information, or meet any specific standard. These independent and limited forms of analysis are insufficient to provide the Commission or consumers with a comprehensive picture of the quality of services available in California.

The bulk of these services do not collect California-specific information and none of them appear to collect information on standard wireline services. For example, *PC Magazine Readers' Choice* addresses wireless service, and offers numerical ratings for various service categories, such as coverage within home area and call quality within home area. The information provided by this service only includes the largest wireless service providers. It omits smaller, regional service providers, and the ratings appear to be based on service nationwide. This is of minimal assistance to California consumers.

Those services that do provide state-specific data do not provide it in a more granular format. This means that consumers in Truckee would be provided with the same information as those in San Diego or San Francisco. This is problematic because each region offers different carriers and, especially for wireless services, different levels of reception.

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<sup>6</sup> DisabRA has already provided extensive information about what disability-specific metrics should be included in such a survey and ways to include consumers with disabilities in such a survey in its Proposals for Additional Reporting Requirements in R.05-04-005, submitted February 7, 2007.

Another issue with these services is cost. At least two independent entities listed by CTIA charge consumers for access to the information they collect. If there is no other way for a customer to evaluate service quality except to purchase access to a service, low-income consumers, including a disproportionate number of people with disabilities will either face hardship in accessing such information or be denied any information whatsoever, notwithstanding the Commission's obligation to ensure that such information is available.

Even for those who can afford to purchase independent information services, it is inappropriate for the Commission to rely on this mechanism to meet its statutory duties. If the Commission takes this course, it places California consumers at the mercy of businesses whose interests may or may not align with the needs of California consumers. These businesses do not have the authority to compel carriers to provide more detailed information or any information at all. Presumably carriers would only provide information that casts their services in the best light possible. DisabRA is concerned about the ramifications of the Commission ceding its responsibilities and authority to monitor service quality to uninterested third parties, particularly in light of DRA's comments demonstrating carriers' lack of openness with consumers.<sup>7</sup>

#### **IV. ACCURATE SERVICE QUALITY MONITORING SHOULD NOT BE SACRIFICED TO ACHIEVE ASYMMETRIC REGULATION**

As stated by both TURN and DRA, while the Commission has adopted asymmetric regulation as an important goal, it should not be pursued so single-mindedly that it results in inferior information about services. California consumers will not be served by an environment that leads to the omission or exclusion of critical information, such as the average number of dropped calls for wireless providers and the average wait time for wireline repair, simply because of the differing nature of telecommunication technologies. Due to the differences in technologies, the Commission will inherently need to have some different reporting requirements for the different types of service providers. This type of information is especially important for people with disabilities who are more reliant on telecommunications than the average consumer

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<sup>7</sup> DRA Comments re: Inclusion of Wireless Coverage Maps, pp. 7-8.

and have less financial resources to experiment with various carriers that may not be appropriate for their needs.

## **V. CONCLUSION**

With the relative recency of the URF decision, the Commission should keep a vigilant watch over the quality of telecommunications services provided to Californians, particularly the most vulnerable consumers, such as those with disabilities, to ensure that the promise of increased choice and decreased price due to increased competition becomes a reality. The Commission cannot expect third parties acting independently and in the course of their own business interests to be a consistent, reliable or comprehensive source of information regarding telecommunications services in California. Therefore, the Commission should take steps to meet its statutory obligations to protect consumers by adopting either of the proposals presented by TURN and DRA, keeping in mind the special needs of consumers with disabilities.

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\_\_\_\_\_/s/\_\_\_\_\_  
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## **CERTIFICATE OF SERVICE**

I certify that I have, by electronic mail to the parties to which an electronic mail address has been provided, served a true copy of "Reply Comments of Disability Rights Advocates on Assigned Commissioner's Ruling and Scoping Memo" on all known parties on R.02-12-004.

Dated June 15, 2007, at Berkeley, California.

/s/  
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